

RAMLO LAW
Kurt Ramlo (SBN 166856)
15021 Ventura Blvd. #544
Los Angeles, CA 91403
RamloLegal@gmail.com
Telephone: (310) 880-9208

HERBERT SMITH FREEHILLS KRAMER (US) LLP
Kyle J. Ortiz (NY 4818571) (*pro hac vice* application
forthcoming)
Kyle.Ortiz@hsfkramer.com
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 715-9100

Attorneys to the Foreign Representatives
of Golden Sphinx Limited

UNITED STATES BANKRUPTCY COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION

In re
Aleksandr Vitalievich Sabadash,

Debtor in a Foreign
Proceeding.

Case No. 2:23-bk-15574-NB

Hon. Neil W. Bason

**Foreign Representatives' Response to
Motion for Court-Ordered Mediation**

Hearing Date: December 16, 2025

Hearing Time: 2:00 p.m.

Courtroom: 1545 and via ZoomGov

Andrew Wood and Alexander Adam, in their capacities as the joint liquidators and
authorized foreign representatives (in such capacity, the “**Foreign Representatives**”) of Golden
Sphinx Limited, a corporation organized and existing under the laws of Jersey (“**Golden Sphinx**”),
by and through their undersigned counsel, respectfully submit this response (“**Response**”) to the
Motion for Court-Ordered Mediation (ECF No. 138) (the “**Motion**”), filed by Garry Y. Itkin (“**Mr.
Itkin**”).¹

RESPONSE

By the Motion, Mr. Itkin seeks a court-ordered “global mediation” that requires the parties
in the above-captioned case to participate in mediation along with (1) parties to the involuntary

¹ Unless stated otherwise, references to docket entry numbers refer to filings in the above-captioned case.

Chapter 7 case of Itkin & Sabadash, Case No. 2:25-bk-11235-NB (the “**Itkin & Sabadash Case**”) and their counsel of record, and (2) the parties to Golden Sphinx’s Chapter 15 case, Case No. 2:22-bk-14320-NB (the “**Golden Sphinx Case**”) and their counsel of record. *See* Motion at 1-2.

The Motion acknowledges that the Foreign Representatives are not parties to the above-captioned case. *See id.* at 2. Yet, the Motion asks the Court to “order parties and their counsel of record to a mediation in the [Itkin & Sabadash Case], [Golden Sphinx Case] and Mr. Sabadash’s bankruptcy case[] before Judge Jury or such other mediator as the Court may appoint.” *Id.* at 6. Any attempt by Mr. Itkin to seek relief against the Foreign Representatives in connection with the above-captioned proceeding would be improper because the Foreign Representatives are not parties to this case, and further, there is no dispute between the Foreign Representatives and any party in interest to this case; accordingly, there is no dispute to refer to mediation.

Contemporaneously with the filing of this Response, the Foreign Representatives are also filing (1) an opposition to the similar motion filed by Mr. Itkin in the Golden Sphinx Case, and (2) a Response to Mr. Itkin’s similar motion filed in the Itkin & Sabadash Case.

CONCLUSION

WHEREFORE, the Foreign Representatives respectfully request that this Court deny the Motion.

HERBERT SMITH FREEHILLS KRAMER
(US) LLP
KYLE J. ORTIZ
(*pro hac vice* application forthcoming)

Attorney to the Foreign Representatives of
GOLDEN SPHINX LIMITED

- and -

RAMLO LAW

By: /s/ Kurt Ramlo
Kurt Ramlo

Local Counsel to the Foreign
Representatives of
GOLDEN SPHINX LIMITED

Dated: December 2, 2025

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 15021 Ventura Blvd. #544, Sherman Oaks, CA 90034.

A true and correct copy of the foregoing document entitled

Foreign Representatives' Opposition to Motion for Court-Ordered Mediation

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 2, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Schuyler Carroll** SCarroll@manatt.com, lduong@manatt.com
- **Benjamin R King** bking@loeb.com, karnote@loeb.com; ladocket@loeb.com; bking@ecf.courtdrive.com
- **Dare Law** dare.law@usdoj.gov
- **Daniel J McCarthy** dmccarthy@hillfarrer.com, spadilla@hillfarrer.com; dflowers@hfbllp.com
- **Keith C Owens** kowens@foxrothschild.com, khoang@foxrothschild.com
- **Oleg Stolyar** astolyar@loeb.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Noah Weingarten** nweingarten@loeb.com, astolyar@loeb.com; fmckeown@loeb.com
- **Michael Zorkin** mz@thezorkinfirm.com

2. SERVED BY UNITED STATES MAIL: On **December 2, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **December 2, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

December 2, 2025

Kurt Ramlo

/s/ Kurt Ramlo

Date

Type Name

Signature